

### REMARKS/ARGUMENT

Claims 10, 20-29, 31-32, and 34-39 remain pending, claims 1-9, 11-19, 30, and 33 previously having been canceled. Claims 20 and 28 have been amended to correct minor errors noted during preparation of this response, and claim 31 has been amended to address the informality noted by the Examiner.

#### Regarding The Allowable Subject Matter

Applicants note with appreciation the continued allowance of claim 10 and indication that claims 27, 32, 37, and 39 would be allowed if rewritten in independent form incorporating the limitations of their respective parent claims. Because these claims are all directly or indirectly dependent on claims 20, 36 or 38, which are believed to be allowable as presented these claims are being retained in dependent form pending the Examiner's further consideration.

#### Regarding the Prior Art Rejections:

In the outstanding Office Action, claims 20-26, 28, 29, and 31, 34-36, and 38 were rejected under 35 U.S.C. 102(b) as being anticipated by Rozman et al. U.S. Patent 5,438,502 (Rozman), and claims 20-22, 24-26, 28, 29, 31, 34-36, and 38 were rejected under 35 U.S.C. 103(a) as being unpatentable over Kojori et al. U.S. Patent 6,850,426 (Kojori) in view of Rozman. Reconsideration and withdrawal of the rejections are respectfully requested in view of the following comments.

As indicated in the Examiner's Response to Arguments, the principal basis for these rejections appears to be his view that the references show input DC and output AC power sensing circuits. This, however, is not correct, and in any event, is not the only distinguishing feature of the rejected claims.

Rozman certainly does not disclose, teach, or suggest DC input power or AC output power sensors. To be sure, there is a DC current sensor 40 and a DC voltage sensor 42, but Fig. 3 clearly demonstrates that the output signals from these sensors are not combined to provide an indication of DC input power. Element 60 is an *adder*, not a multiplier.

Rozman discloses a third sensor 26, but this is solely an AC output *voltage* sensor. There is no AC output current sensor. Nor is the output of AC output sensor 26 combined with any other signal to produce an indication of power. Like element 60, elements 62 and 70 in Fig. 3 are adders, and not multipliers. In short, there is no disclosure, teaching or suggestion in Rozman of:

a power control unit is operable in response to . . . [input DC and output AC power] signals . . . to control [a] power conditioning unit.

Moreover, there is no disclosure, teaching or suggestion in Rozman of a power control unit which is operable:

. . . to control [a] power conditioning unit to minimize the difference between the DC power drawn by the input power conditioning unit and the AC power delivered to the load,

whereby the capacity of the energy storage unit is minimized.

Minimizing the difference between the DC power drawn by the input power conditioning unit and the AC power delivered to the load is never mentioned. Rozman's only concern is compensating for variable input frequencies in a VSCF power system.

Claims 20-26, 28, 29, and 31, 34-36, and 38 are patentable over Rozman for all these reasons.

Likewise, Kojori does not disclose, teach, or suggest sensors for measuring DC input power and AC output power. The Examiner associates sensors 102 and 120 in Fig. 1C with the claimed DC and AC power sensors, but these elements are just DC input voltage and current sensors for the two directions of power flow. There is no output sensor at all, AC or otherwise.

Even apart from the foregoing, there is no disclosure, teaching or suggestion of multiplication or any other operation to provide an indication of power from the outputs of sensors. If the rejection based on Kojori is adhered to, the Examiner is respectfully requested to point out where in the reference there is any disclosure, teaching or suggestion of an AC output power sensor, or that the outputs of sensors 102 and 120 are converted to measures of power.

Kojori also fails to disclose, teach, or suggest controlling an input power conditioning unit to minimize the difference between the DC power drawn by the input power conditioning unit and the AC power delivered to the load to minimize energy storage requirements, or for any other reason. Again, if the rejection based on Kojori is adhered to, the Examiner is respectfully requested to point out where in the reference there is a teaching of this claimed feature.


Actually, Kojori does not even have a power conditioning unit. Kojori's controller 2, which receives the signals from sensors 102 and 120 through isolation unit 104, is not a power conditioning unit. Rather, it "... generates the appropriate gating signals to control the switching of power conversion bridge 3 to provide bi-directional power flow" (see col. 10, lines 44-46). Controller 2 therefore corresponds to inverter control unit 32 shown in Fig. 3 of the present application.

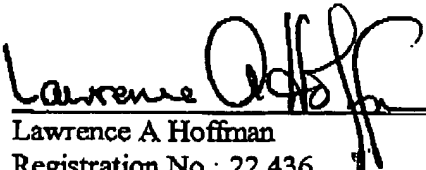
Since neither Rozman nor Kojori discloses, teaches, or suggests sensing power, or minimizing the difference between the input power and the output power, combining the references will not remedy their mutual deficiencies. Accordingly, claims 20-22, 24-26, 28, 29, 31, 34-36, and 38 are not rendered unpatentable by a combination of their teachings.

In view of the foregoing, favorable reconsideration and allowance of this application are respectfully solicited.

I hereby certify that this correspondence is being transmitted by Facsimile to (571) 273-8300 addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date indicated below.

Respectfully submitted,

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LAH: